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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Lighting Defense Group LLC,
Plaintiff

v.

Shanghai Sansi Electronic Engineering
Co., Ltd.,
Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Lighting Defense Group LLC (“LDG”) hereby brings this Complaint against Defendant Shanghai Sansi Electronic Engineering Co., Ltd. (“Shanghai Sansi” or “Sansi”) for infringement of U.S. Patent Nos. 8,256,923 (“the ’923 patent”), 9,163,807 (“the ’807 patent”), and 7,874,700 (“the ’700 patent”) and alleges as follows:

BACKGROUND

1. LDG is the owner of more than 40 issued U.S. patents and pending patent applications relating to lights and lighting. The principals of LDG have consulted on lighting design and implementation issues for a variety of companies, including Costco Wholesale, Motorola, American Express, Simon Properties, Prologis, and Crate & Barrel. Additionally, LDG principals have designed and patented lighting products that have been manufactured and sold globally by major manufacturers, including Thomas & Betts/ABB, Acuity, Cooper Lighting/Signify, and Valmont Industries.

2. LDG’s patent portfolio encompasses innovative heat management technology for high efficiency lighting products, including various aspects and improvements relating to light emitting diode (LED) lighting technology. The LDG patent portfolio describes and claims technologies that permit more effective heat management for LED lighting products that may be used indoors or outdoors, including in homes, offices, warehouses, retail spaces, and similar spaces. This technology improves the efficiency of lighting through effective heat dispersion, in turn allowing the use of more efficient, longer lasting, and high power LED lighting products and solutions.

3. LDG is the owner of U.S. Patent No. 8,256,923 (“the ’923 patent”), titled Heat Management for a Light Fixture with an Adjustable Optical Distribution. The ’923 patent issued on September 4, 2012. A true and correct copy of the ’923 patent is attached as Exhibit 1 hereto.

4. LDG is the owner of U.S. Patent No. 9,163,807 (“the ’807 patent”), titled Heat Management for a Light Fixture with an Adjustable Optical Distribution. The ’807 patent issued on October 20, 2015. A true and correct copy of the ’807 patent is attached

1 as Exhibit 2 hereto.

2 5. LDG is the owner of U.S. Patent No. 7,874,700 (“the ’700 patent”), titled
3 Heat Management for a Light Fixture with an Adjustable Optical Distribution. The ’700
4 patent issued on January 25, 2011. A true and correct copy of the ’923 patent is attached
5 as Exhibit 3 hereto.

6 6. On or about June 26, 2020, LDG sent a letter to Bishou Chen, Legal
7 Representative for Shanghai Sansi. The June 26, 2020 letter identified the ’923, ’807, and
8 ’700 patents, as well as an additional patent owned by LDG: U.S. Patent No. 8,939,608
9 (“the ’608 patent”).

10 7. The June 26, 2020 letter stated that Shanghai Sansi required a license to the
11 ’923, ’807, ’700, and ’608 patents in order to avoid infringement by the making, using,
12 selling, importing or otherwise offering certain LED lighting products identified in that
13 letter, including at least the following: the Sansi C21BB-WE Omnidirectional Light Bulb,
14 Sansi C21BB-TE26 UV Light Bulb, Sansi C21BB-QE Smart RGB Light Bulb, Sansi
15 C21BB-TE26/27 Plain Light Bulb, Sansi C21BB-RE Dimmable Light Bulb, Sansi
16 C21BB-UE Light Bulb, Sansi C21GL-CE26/27 Full Spectrum Glow Light, Sansi C21GL-
17 AE26 Full Cycle Glow Light, Sansi C21GL-DE26 Full Spectrum Glow Light, Sansi
18 C21GL-CE26/27 Full Spectrum Glow Light, Sansi C21GL-AE26-Flowering Glow Light,
19 Sansi C21BB-ZE39/E40 High Bay Light, and BR30 Non-Dimmable LED Light Bulb.

20 8. A copy of the June 26, 2020 letter is attached hereto as Exhibit 4. Copies of
21 the exemplary claim charts showing Shanghai Sansi’s infringement of the LDG ’923,
22 ’807, ’700, and ’608 patents are attached hereto as Exhibits 5, 6, 7, 8, 9, 10, 11, and 12.

23 9. On or about August 27, 2020, Shanghai Sansi, through its outside counsel
24 Xiaofei Xue, responded to LDG’s June 26, 2020 letter in which Shanghai Sansi contended
25 that it did not infringe any of the identified LDG patents. Shanghai Sansi also contended
26 in its August 27, 2020 letter that the claims of LDG patents were invalid, and took the
27 position that “a license of the LDG Patents is highly unnecessary.” A copy of the August
28 27, 2020 letter from Xiaofei Xue is attached hereto as Exhibit 13.

1 10. As a result of Shanghai Sansi's refusal to take a license or even enter into
2 licensing discussions any of the LDG patents, LDG filed a complaint with Amazon.com
3 through Amazon.com's patent evaluation procedures on June 1, 2021, regarding Shanghai
4 Sansi's infringement by products on claim 15 of U.S. Patent No. 8,939,608.

5 11. Following the filing of the complaint, LDG received a response from
6 Amazon.com stating: "We have received your notice of infringement. Due to the nature of
7 your notice, we have transferred it to a specialized team for review. Responses may be
8 delayed as a result."

9 12. Following a review by Amazon, upon information and belief, the accused
10 Shanghai Sansi products were de-listed by Amazon between June 2 and June 9, 2021.

11 13. On June 10, 2021, LDG received an email from Shanghai Sansi stating that
12 Shanghai Sansi demanding that LDG withdraw its Amazon.com complaint. A copy of the
13 June 10, 2021 email from Shanghai Sansi is attached hereto as Exhibit 14. LDG did not
14 withdraw its complaint.

15 14. LDG nevertheless persisted in its attempts to continue discussions with
16 Shanghai Sansi regarding its infringement of the LDG patents and the Amazon.com
17 complaint. On June 23, 2021, LDG received an email from Ethan Ma, counsel for
18 Shanghai Sansi, where he confirmed, "I am writing on behalf of our client Shanghai Sansi
19 Electronic Engineering Co., Ltd. ("Sansi") in relation to the complaint you filed with
20 Amazon against our client." A copy of the June 23, 2021 email from Mr. Ma is attached
21 hereto as Exhibit 15.

22 15. On June 30, 2021, Sansi LED Lighting, Inc. ("Sansi LED Lighting") filed a
23 complaint for declaratory judgment against LDG in this District seeking a declaration that
24 U.S. Patent No. 8,939,608 is not infringed and/or is invalid. *Sansi LED Lighting, Inc. v.*
25 *Lighting Defense Group, LLC*, Case No. 2:21-cv-001147-DWL (U.S. District Court for
26 the District of Arizona). Sansi LED Lighting also asserted various state law tort claims.

27 16. Upon information and belief, Sansi LED Lighting is a wholly owned
28 subsidiary of Shanghai Sansi Electronic Engineering Co., Ltd.

1 1338(a), because this complaint arises under the federal patent laws of the United States.

2 25. Shanghai Sansi is subject to personal jurisdiction in this Court because it
3 commits and has committed acts within this District giving rise to this action and has
4 established minimum contacts with the forum state of Arizona. For example, Sansi
5 distributes infringing LED lighting products throughout the United States, including in
6 this District. On its website, <https://www.sansi.com>, Sansi offers its LED lighting products
7 through www.sansiled.com as well as through retailers including Amazon US, Walmart,
8 eBay, Home Depot, Lowes, and Newegg.

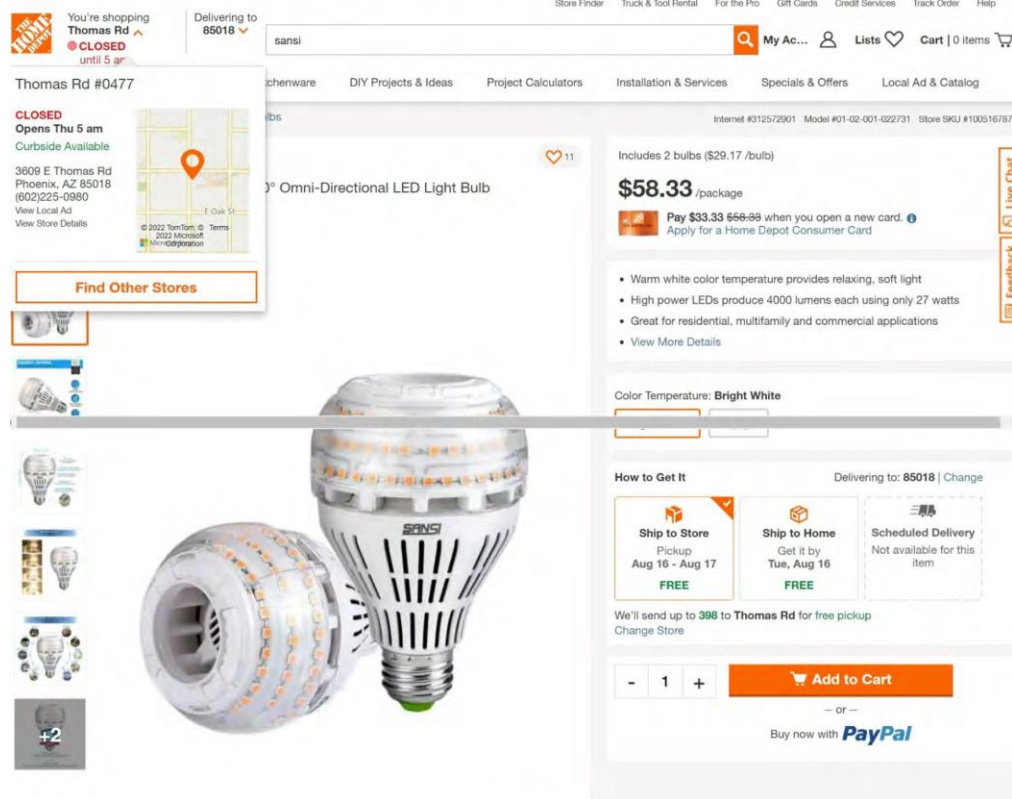
9 26. A screenshot of the website for Shanghai Sansi is attached hereto as Exhibit
10 16 (www.sansi.com; accessed 8/10/2022). Below is an excerpt from that website showing
11 Shanghai Sansi's name and address and "E-Commerce" links to sansiled.com, Amazon
12 US, Walmart, eBay, and Home Depot.

Product	Case
LED Display	LED Display
LED Lighting	LED Lighting
Integrated Intelligent System	Integrated Intelligent System
Solution	E-Commerce
LED Display	sansiled.com
LED Lighting	Amazon US
Integrated Intelligent System	Walmart
	eBay
	Home Depot
Shanghai Sansi Electronic Engineering Co., Ltd.	
No.1280, Shuying Rd, Minhang District, Shanghai, China	
overseas@sansitech.com	
+86-021-54883434	
+86-021-54883432	
+86-021-54883445	

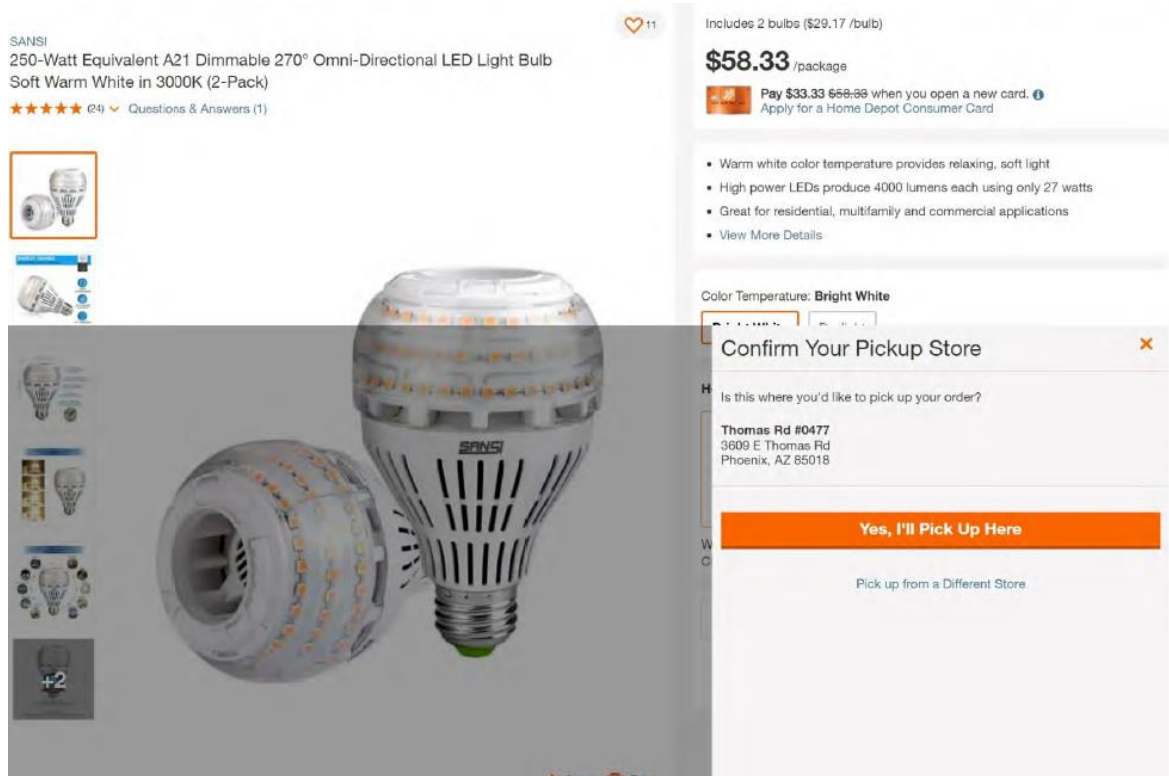
26 27. The excerpt above from the Shanghai Sansi website provides an "E-
27 Commerce" link to the retailer Home Depot. Clicking on that link to Home Depot will
28

1 take the potential consumer to the Home Depot website. If the potential consumer's
2 location is not known, the website will prompt the consumer for his or her location. A
3 potential consumer located in Scottsdale, Arizona, within this District, is provided Sansi
4 LED lighting products that can be purchased, delivered, or picked up from the Home
5 Depot retail store located in Scottsdale, Arizona as well as in nearby cities, including
6 Phoenix, Arizona, within this District. Attached as Exhibit 17 is a website showing
7 "search results for sansi at The Home Depot" which identifies four different Home Depot
8 stores in Scottsdale, Phoenix, and Mesa—all within this District—where various Sansi
9 branded LED lighting products may be purchased. (www.homedepot.com/s/sansi;
10 accessed 8/2/2022.) One of the Home Depot stores is identified as Thomas Rd #0477 and
11 is located at 3609 E. Thomas Road, Phoenix, Arizona 85018, located in this District.

12 28. Attached as Exhibit 18 is a website from The Home Depot showing a Sansi
13 250-Watt Equivalent A21 Dimmable Omni-Directional LED Light Bulb Soft Warm
14 White in 3000k (2-Pack) that can be shipped for pickup to the Thomas Rd #0477 Home
15 Depot store in Phoenix, Arizona. (accessed 8/10/202.) An excerpt from this website is
16 shown below:



29. The consumer can then select the Sansi A21 LED bulb for purchase and “Pick Up In Store” at the Thomas Rd #0477 Home Depot store in Phoenix, Arizona. Attached as Exhibit 19 is a website showing the selection of the above identified Sansi 250-Watt Equivalent A21 LED bulb and a link to confirm the pickup store at the Thomas Rd #0477 Home Depot store in Phoenix, Arizona. (accessed 8/10/2022.)



30. The customer can then purchase the above identified Sansi 250-Watt Equivalent A21 LED bulb for pickup at the Thomas Rd Rd #0477 Home Depot store in Phoenix, Arizona. Attached as Exhibit 20 is a website page showing the Home Depot Secure Checkout for the order of the Sansi 250-Watt Equivalent A21 LED bulb for pickup at the Thomas Rd Rd #0477 Home Depot store in Phoenix, Arizona. (accessed 8/10/2022.) Below is an excerpt from this website page showing the order for pickup of the Sansi 250-Watt Equivalent A21 LED bulb at the Thomas Rd Rd #0477 Home Depot store in Phoenix, Arizona.

Secure Checkout

1. Contact Information

First Name Last Name

Phone Number

☐ Text me when my order is ready.

Home Depot will send you a text message when your order is ready for pickup. Message and data rates may apply and texts may be sent between the hours of 8:00 am and 9:00 pm. Privacy Policy at www.homedepot.com/c/Privacy_Security_Full_Terms

Will someone else pick it up? ☐

Continue

2. Store Pickup

3. Payment Method

Your Order **\$63³⁵**

Pick Up In Store

See below for pick up availability. **FREE**

Thomas Rd Store
3609 E Thomas Rd, Phoenix, AZ 85018 | (602)225-0980
Curbside Available

SANSI 250-Watt Equivalent A... **\$58.33**
Qty : 1
Expected pick up by **Aug 16 - Aug 17**

Subtotal **\$58.33**
Pick Up In Store **FREE**
Estimated Sales Tax* **\$5.02**
Apply Tax Exempt ID

Total **\$63³⁵**
Have a promo code?

31. Venue is proper in this District because Shanghai Sansi is a foreign corporation and may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). As alleged above, Shanghai Sansi also is subject to personal jurisdiction in this District.

COUNT ONE

Infringement of U.S. Patent No. 8,256,923 (“the ’923 patent”)

32. LDG incorporates by reference Paragraphs 1 through 31 as if fully set forth herein.

33. Shanghai Sansi, without authorization from LDG, makes, uses, sells, or offers for sale within the United States, including in this District, or imports into the United States, LED lighting products that infringe one or more claims of the ’923 patent. These infringing LED lighting products include LED lighting products in the categories of “A” shape (or “A” line) products (such as A19 and A21 LED light bulbs), “grow lights,” and directional lights (such as BR30 or PAR30 light bulbs).

34. Shanghai Sansi’s infringing LED lighting products include at least following products identified in LDG’s June 26, 2020 letter: (1) SANSI C21BB-WE

1 Omni-directional Light Bulb, (2) SANSI C21BB-TE26 UV Light Bulb, (3) SANSI
2 C21BB-QW Smart RGB Light Bulb, (4) SANSI C21BB-TE26/27 Plain Light Bulb, (5)
3 SANSI C21BB-RE Dimmable Light Bulb, (6) SANSI C21BB-UE Light Bulb, (7) SANSI
4 C21GL-CE26/27 Full Spectrum Glow Light, (8) SANSI C21GL-AE26 Pull Cycle Glow
5 Light, (9) SANSI C21GL-DE26 Pull Spectrum Glow Light, (10) SANSI C21GL-AE26
6 Plowering Glow Light, (11) SANSI C21BB-ZE39/E40 High Bay Light, and (12) BR30
7 Non-Dimmable LED Light Bulb. Exemplary claim charts provided to Shanghai Sansi in
8 June 2020 show Shanghai Sansi's infringement of each and every element of at least one
9 claim of the '923 patent. *See Exhibits 4, 5 and 6.*

10 35. In addition, attached hereto as Exhibit 21 is an exemplary chart showing
11 how a Sansi A21 LED bulb, product number C21BB-VE26-18W, 18W (150 Watt
12 Equivalent) A21 LED bulb, 2500 lumens, 5000k daylight, E26 base, meets each and every
13 element of at least claim 1 of the '923 patent.

14 36. Attached hereto as Exhibit 22 is another exemplary chart showing how a
15 Sansi LED grow light—Sansi C21GL-CE26-24W—meets each and every element of at
16 least claim 1 of the '923 patent.

17 37. Attached hereto as Exhibit 23 is yet another exemplary chart showing how a
18 Sansi A21 LED bulb, 27W (250 Watt Equivalent) A21 Omni-Directional Ceramic LED
19 light bulb, 4000 lumens, 5000k daylight, E26 Medium Screw Base, light meets each and
20 every element of at least claim 1 of the '923 patent.

21 38. Attached hereto as Exhibit 24 is another exemplary chart showing how
22 Sansi 10W, 20W, 30W, and 40W adjustable head clip-on LED grow light meets each and
23 every element of at least claim 17 of the '923 patent.

24 39. By the foregoing acts, Shanghai Sansi has directly infringed, and continues
25 to directly infringe, literally or under the doctrine of equivalents at least one claim of the
26 '923 patent in violation of 35 U.S.C. § 271.

27 40. Shanghai Sansi has had constructive knowledge of the '923 patent since at
28 least September 4, 2012, the date the '923 patent issued.

41. Shanghai Sansi has had actual knowledge of the '923 patent as least through LDG's letter dated June 26, 2020, which provided notice of the '923 patent and its infringement by at least the above identified infringing products.

42. Shanghai Sansi has been on actual notice of infringement of the '923 patent consistent with the requirements of 35 U.S.C. § 287(a) since at least June 26, 2020.

43. Shanghai Sansi's infringement of the '923 patent has been and continues to be knowing, willful, deliberate, and intentional, as Shanghai Sansi has continued its acts of infringement by continuing to make, use, sell, offer for sale, or import into the United States, one or more of the foregoing identified Accused Products after being placed on constructive and actual notice of the '923 patent and its infringement, thus acting in reckless disregard of its infringement of and LDG's rights in the '923 patent.

44. Such acts of infringement have caused damages to Plaintiff in an amount to be proven at trial, but in no event less than a reasonable royalty.

COUNT TWO

Infringement of U.S. Patent No. 9,163,807 ("the '807 patent")

45. LDG incorporates by reference Paragraphs 1 through 44 as if fully set forth herein.

46. Shanghai Sansi, without authorization from LDG, makes, uses, sells, or offers for sale within the United States, including in this District, or imports into the United States, LED lighting products, including at least the following LED lighting products: (1) SANSI C21BB-WE Omni-directional Light Bulb, (2) SANSI C21BB-TE26 UV Light Bulb, (3) SANSI C21BB-QW Smart RGB Light Bulb, (4) SANSI C21BB-TE26/27 Plain Light Bulb, (5) SANSI C21BB-RE Dimmable Light Bulb, (6) SANSI C21BB-UE Light Bulb, (7) SANSI C21GL-CE26/27 Full Spectrum Glow Light, (8) SANSI C21GL-AE26 Pull Cycle Glow Light, (9) SANSI C21GL-DE26 Pull Spectrum Glow Light, (10) SANSI C21GL-AE26 Flowering Glow Light, (11) SANSI C21BB-ZE39/E40 High Bay Light, and (12) BR30 Non-Dimmable LED Light Bulb. Exemplary claim charts provided to Shanghai Sansi in June 2020 show Shanghai Sansi's

1 infringement of each and every element of at least one claim of the '807 patent. *See*
2 Exhibits 4, 7, and 8.

3 47. In addition, attached hereto as Exhibit 25 is an exemplary chart showing
4 how SANSI 27W (250 Watt Equivalent) A21 Omni-Directional Ceramic LED Light Bulb,
5 4000 Lumens, 5000K Daylight, E26 Medium Screw Base Floodlight Bulb—meets each
6 and every element of at least claims 14 of the '807 patent and, therefore, infringes at least
7 those claims of the '807 patent.

8 48. By the foregoing acts, Shanghai Sansi has directly infringed, and continues
9 to directly infringe, literally or under the doctrine of equivalents at least one claim of the
10 '807 patent in violation of 35 U.S.C. § 271.

11 49. Shanghai Sansi has had constructive knowledge of the '807 patent since at
12 least October 20, 2015, the date the '807 patent issued.

13 50. Shanghai Sansi has had actual knowledge of the '807 patent as least through
14 LDG's letter dated June 26, 2020, which provided notice of the '807 patent and its
15 infringement by at least the above identified infringing products.

16 51. Shanghai Sansi has been on actual notice of infringement of the '807 patent
17 consistent with the requirements of 35 U.S.C. § 287(a) since at least June 26, 2020.

18 52. Shanghai Sansi's infringement of the '807 patent has been and continues to
19 be knowing, willful, deliberate, and intentional, as Shanghai Sansi has continued its acts
20 of infringement by continuing to make, use, sell, offer for sale, or import into the United
21 States, one or more of the foregoing identified Accused Products after being placed on
22 constructive and actual notice of the '807 patent and its infringement, thus acting in
23 reckless disregard of its infringement of and LDG's rights in the '807 patent.

24 53. Such acts of infringement have caused damages to Plaintiff in an amount to
25 be proven at trial, but in no event less than a reasonable royalty.

26 **COUNT THREE**

27 **Infringement of U.S. Patent No. 7,874,700 ("the '700 patent")**

28 54. LDG incorporates by reference Paragraphs 1 through 53 as if fully set forth

1 herein.

2 55. Shanghai Sansi, without authorization from LDG, makes, uses, sells, or
3 offers for sale within the United States, including in this District, or imports into the
4 United States, LED lighting products, including at least the following LED lighting
5 products: (1) SANSI C21BB-WE Omni-directional Light Bulb, (2) SANSI C21BB- TE26
6 UV Light Bulb, (3) SANSI C21BB-QW Smart RGB Light Bulb, (4) SANSI C21BB-
7 TE26/27 Plain Light Bulb, (5) SANSI C21BB-RE Dimmable Light Bulb, (6) SANSI
8 C21BB-UE Light Bulb, (7) SANSI C21GL-CE26/27 Full Spectrum Glow Light, (8)
9 SANSI C21GL-AE26 Pull Cycle Glow Light, (9) SANSI C21GL-DE26 Pull Spectrum
10 Glow Light, (10) SANSI C21GL-AE26 Flowering Glow Light, (11) SANSI C21BB-
11 ZE39/E40 High Bay Light, and (12) BR30 Non-Dimmable LED Light Bulb. Exemplary
12 claim charts provided to Shanghai Sansi in June 2020 show Shanghai Sansi's
13 infringement of each and every element of at least one claim of the '700 patent. *See*
14 Exhibits 4, 9 and 10.

15 56. In addition, attached hereto as Exhibit 27 is an exemplary chart showing
16 how at least one SANSI LED lighting product—SANSI 6500 lumens, A21 LED bulb, 650
17 Watt Equivalent, E26, product family C21BB-02E26-35—meets each and every element
18 of at least claim 1 of the '700 patent.

19 57. By the foregoing acts, Shanghai Sansi has directly infringed, and continues
20 to directly infringe, literally or under the doctrine of equivalents the '700 patent in
21 violation of 35 U.S.C. § 271.

22 58. Shanghai Sansi has had constructive knowledge of the '700 patent since at
23 least January 25, 2011, the date the '700 patent issued.

24 59. Shanghai Sansi has had actual knowledge of the '700 patent as least through
25 LDG's letter dated June 26, 2020, which provided notice of the '700 patent and its
26 infringement by at least the above identified infringing products.

27 60. Shanghai Sansi has been on actual notice of infringement of the '700 patent
28 consistent with the requirements of 35 U.S.C. § 287(a) since at least June 26, 2020.

DEMAND FOR JURY TRIAL

LDG requests a trial by jury of all issues raised herein that are triable by a jury.

Dated: August 31, 2022.

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